

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re: Ruby Williams  
Willie Williams**

**Chapter 13**

**Debtor(s)**

**Bankruptcy No. 17-10341-MDC**

**\* \* \* \* \***

**MOTION TO FILE AN AMENDED CHAPTER 13 PLAN AFTER  
CONFIRMATION**

We, Ruby Williams and Willie Williams, by and through our attorney, Thomas G. Egner, hereby Motion the court to File an Amended Chapter 13 Plan after Confirmation for reason(s) stated below:

1. We filed the within Chapter 13 on January 17, 2017.
2. Our Chapter 13 Plan was filed on July 20, 2017 was confirmed on September 28, 2017 at \$559.14 per month for 55 months.
3. The confirmed Chapter 13 Plan scheduled to pay the following:
  - Trustee's Fee: 10.00%
  - Attorney's Fee: \$2,500.00
  - Priority Claims: IRS: \$11,026.90
  - Secured Claims: Water Revenue Bureau Philadelphia \$756.10
  - Secured Claims: City of Philadelphia \$9,197.00
  - Secured Claims: American Heritage FCU: \$1,931.09
  - Unsecured Claims: \$6521.05
  - Total Base Amount: \$32,741.58
4. During the case, we fell behind with the trustee on two occasions and with the mortgage company on another occasion.
5. As a result of falling behind on payments with the trustee and with the mortgage company, Motions were filed against us.
6. We needed our bankruptcy attorney's assistance to defend these Motions. We incurred an additional \$1500.00 in legal fees that we would like to pay through the Chapter 13 plan.
7. We would like to capitalize any arrears owed to the trustee and incorporate the attorney's fees into the new monthly payment. The Modified Plan filed on April 16, 2019 will accomplish this.
8. Specifically, we propose the following amendments to the Chapter 13 Plan:
  - Trustee's Fee: 10.00% (\$2788.72)
  - Attorney's Fee: \$4,000.00
  - Priority Claims: IRS: \$11,026.90

- Secured Claims: \$8140.049
- Unsecured Claims: \$6,521.05
- Total Base Amount: \$34,408.25

9. The modified plan will have no effect on the distribution under the confirmed plan to any class of creditors.

Date: June 5, 2019

/s/ Ruby Williams

Ruby Williams, Debtor

Date: June 5, 2019

/s/ Willie Williams

Willie Williams, Debtor